



MACEY LAW

May 10, 2019

BY ECF

Honorable Edward R. Korman
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York, 11201

Re: United States v. Serge Edouard
Criminal Docket No. 05-0400 (ERK)

Dear Judge Korman:

The reply to the Government's Response in Opposition to Defendant's Motion to Correct Sentence is currently due on May 10th, 2019. While preparing for the reply it became clear to undersign counsel that there are two important cases that may impact the response of the Government. In an effort to come to an agreement, undersign counsel provided the cases to AUSA Virginia Nguyen and several discussions ensued. After several days of research and discussion it does appear that an agreement may be reached or at a minimum most, if not all, of the issues will be narrowed down and resolved.

Therefore, in our attempts to narrow the issues before the court and finalize pending discussions undersign counsel respectfully request an additional thirty (30) days to reply to the Government's Response. AUSA Virginia Nguyen has no objection to any continuance that the court may allow.

Respectfully submitted,

By: /s/ David W. Macey
 David W. Macey, Esq.
 Attorney for Defendant
 305-860-2562

Cc: Clerk of Courts (by ECF)
 AUSA, Virginia Nguyen (by ECF)